

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JAMES W. HARPEL,)	
)	
Plaintiff,)	
)	Civil Action No.: 1:12-cv-10280-RWZ
v.)	
)	
RONALD A. NICHOLSON)	
)	
Defendant.)	
)	

STIPULATED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Pursuant to Fed. R. Civ. P. 6(b) and 12(a)(4) and good cause shown, Defendant Ronald A. Nicholson hereby moves to extend the time within which he has to answer or otherwise respond to Plaintiff's complaint by one week in light the state of emergency and interruption of business caused to Defendant's counsel by Hurricane Sandy. No party will be prejudiced by the relief requested; and Plaintiff has stipulated to the extension of time for Defendant to respond to the Complaint for one week up to and including November 7, 2012.

WHEREFORE, Defendant requests that its motion be allowed.

Respectfully submitted,
Defendant Ronald A. Nicholson,
By his attorneys,

/s/ James J. Regan
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James J. Regan (Admitted *Pro Hac Vice*)
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/s/ Matthew J. Walko
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Dated: October 29, 2012

Assented To:
Plaintiff James W. Harpel,
By his attorneys,

/s/ Daniel J. Murphy
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on October 29, 2012.

/s/ Matthew J. Walko
Matthew J. Walko (BBO No. 562172)